## **SAPONE & PETRILLO, LLP**

William S. Petrillo, Esq., Partner

Edward V. Sapone, Esq., Partner

**MANHATTAN** 

40 Fulton Street, 17th Floor New York, New York 10038 Telephone: (212) 349-9000 Facsimile: (212) 349-9003 E-mail: ed@saponepetrillo.com **LONG ISLAND** 

1103 Stewart Avenue, Suite 200 Garden City, New York 11530 Telephone: (516) 678-2800 Facsimile: (516) 977-1977 E-mail: bill@saponepetrillo.com

January 22, 2022

Honorable John Michael Vazquez
United States District Judge
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: U.S. v. Thomas Lanzana

Indictment No.: 2:19-CR-00592-JMV-1

Dear Judge Vazquez:

I am counsel to Defendant Thomas Lanzana in the above-referenced case. Two days ago on January 20th, Mr. Lanzana received a letter by email (not the actual letter) advising him that today he must surrender to the SCP at El Reno, Oklahoma. I write to respectfully ask you to so order this letter so that he can make arrangements for his live-in fiancé's medical care and secure transportation to the BOP facility which is a three-hour trip from his house in Kansas.

Mr. Lanzana was able to reach me after hours yesterday after he had spoken with Pretrial Services. According to the officer, and in my experience, defendants always receive a letter by which they are given 10-14 days' notice before they are required to actually get themselves to the BOP facility. Once they are given the surrender date, the advanced notice is, of course, important for activities such as transportation, child care, etc.

Here, you may remember that Mr. Lanzana's live-in fiancé, with whom Lanzana has had a 12-year relationship, is 100 percent reliant upon him, as she suffers with extreme agoraphobia.

While Your Honor was kind enough to give us plenty of time to wind down Mr. Lanzana's affairs before his eventual surrender, and the government was kind enough to consent to my last application, Mr. Lanzana now needs just six days before actually getting to the facility. He lives in Wichita, Kansas, 200 miles and three hours away from the facility.

Given the above-described hardship, I respectfully ask you to allow Mr. Lanzana to self-surrender no later than January 28, 2022 That way, he can safely leave his fiancé, and arrange for transportation from Kansas to Oklahoma. \*

The Court's consideration is very much appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: AUSA Anthony Torntore, Esq.

\*Request granted.

No further extension will be permitted.

SO ORDERED.

<u>s/John Michael Vazquez</u> John Michael Vazquez, U.S.D.J.

Date: 1/22/2022